

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Sandra Perillo	:	Chapter 13
	:	Case No. 22-10120-MDC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY SPECIALIZED LOAN SERVICING, LLC

Debtor, Sandra Perillo, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Specialized Loan Servicing, LLC hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied is unsure of the same.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted in part. Admitted payments were missed as Debtor applied for a Loan Modification and was unsure of the terms. Debtor is aware of what is expected of her going forward and asks for the chance to resume regular payments going forward.
11. No response.
12. Denied.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: June 23, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Keri P. Ebeck, Esq.
Attorney for Movant *Specialized Loan Servicing, LLC*.
Electronic Notice to *kebeck@bernsteinlaw.com*

Dated: June 23, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107